

EXHIBIT B

From: Kelsey Gdovin
Sent: Thursday, January 17, 2019 11:54 AM
To: Justin Everett
Subject: RE: ADR Stipulation Form

I will indicate on the form that you intend to request a waiver. Do you agree to Judi Teeter?

From: Justin Everett <jeverett179@gmail.com>
Sent: Thursday, January 17, 2019 11:12 AM
To: Kelsey Gdovin <KGdovin@cohenlaw.com>
Subject: Re: ADR Stipulation Form

I can request a waiver

On Thu, Jan 17, 2019, 10:56 AM Kelsey Gdovin <KGdovin@cohenlaw.com> wrote:

Mr. Everett,

Attached is a proposed ADR stipulation. Fieldworks agrees to mediation, and we propose using Judi Teeter as the mediator. Her fee was \$1400 in 2018. Please let me know if she is acceptable.

Fieldworks will pay 50% of her fee. Fieldworks does not have the authority to waive your half of the fee on behalf of the Court, but we noted on the ADR stipulation that the Court may waive 50% of the fee due to your *in forma pauperis* status.

If you are looking to settle and you give me a reasonable number today, I will propose it to the client. I do not have any authority at this time, but I will at least take the number to them. It seems to me that the court was saying that the value of this case does not warrant a jury trial. I can't promise anything, but if you get the numbers closer to where we were at the case management conference, I will see what I can do. After today, we will be moving forward with filing the ADR stipulation.

All the best,

Kelsey

Kelsey Gdovin

Attorney

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